

**Affidavit of Matthew McLoughlin on Behalf of Shirley Stewart for Vincent Stewart**

My name is Matthew McLoughlin. I am the Director of Programs at the Chicago Community Bond Fund. On April 1, 2020, I spoke to Shirley Stewart, who provided me the following information about Vincent Stewart, her son, who is a detainee in the Cook County Jail.

1. Mr. Stewart is 38 years old. He is residing in Division 8 of the Cook County Jail. He is incarcerated on a \$80,000 bond that he cannot afford to pay.
2. Mr. Stewart has Hodgkin's Lymphoma, and his white blood count is currently 33% of the normal rate.
3. Mr. Stewart's division is on lockdown. He resides in a dormitory setting. Everyone in the dormitory shares a microwave for cooking food.
4. He has been given no additional cleaning or sanitizing products since the outbreak of COVID-19 in Illinois and in the Jail. No procedures have changed in the jail, except some people have left.
5. Guards are wearing masks and gloves, though that began only recently. Detainees are not given any personal protective equipment (PPE).

I am providing this hearsay declaration because of restrictions on visitors and contact with detainees in the Cook County Jail. I declare under penalty of perjury that the foregoing is true and correct.

April 2, 2020  
Chicago, Illinois

s/ Matthew McLoughlin  
Matthew McLoughlin